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Via ECF

Hon. Magistrate Judge Michael A. Hammer
Martin Luther King, Jr. Federal Building & U.S. Courthouse
U.S. District Court for the District of New Jersey
50 Walnut Street, Courtroom 3C
Newark, New Jersey 07101

Re: *Castro et al. v. Sanofi Pasteur Inc.*, 2:11-cv-07178 (JLL) (MAH)
Marquez & Bengochea, M.D., P.A. v. Sanofi Pasteur Inc., 2:12-cv-00652 (JLL) (MAH)

Dear Judge Hammer:

This firm represents Sanofi Pasteur Inc. in *Castro et al., v. Sanofi Pasteur Inc.*, 2:11-cv-07178 (the "Consolidated Action") and *Marquez & Bengochea, M.D., P.A. v. Sanofi Pasteur Inc.*, 2:12-cv-06052. We write to provide the Court with the information requested in Your Honor's letter of April 25, 2012. (*Marquez*, Dkt. No. 3).

As an initial matter, Sanofi notes that it has been proceeding on the assumption that, as Plaintiffs assert, the *Marquez* Action "has been consolidated with and into" the Consolidated Action pursuant to Pretrial Order No. 1. (*Marquez* Dkt. No. 4; *see also* Consolidated Action Dkt. No. 72 (setting time for response to *Marquez* complaint following ruling on Sanofi's motion to dismiss the amended class action complaint in the Consolidated Action). Accordingly, Sanofi has previously filed in the Consolidated Action its Fed. R. Civ. P. 26(a) initial disclosures and its *pro hac vice* applications for the six attorneys from Proskauer Rose LLP listed on the following page that are not members of the New Jersey bar. (*See* Consolidated Action Dkt. Nos.16-20, 22).

Of course, if the Court would like Sanofi to refile any of these documents under the *Marquez* docket for any reason, we would be happy to do so upon the Court's request.

Respectfully submitted,

/s/ Ryan P. Blaney

Ryan P. Blaney

cc: Counsel of Record (via ECF)

List of Defense Counsel in the Consolidated Action

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